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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Use of N11 Codes and Other)
Abbreviated Dialing Arrangements)
)
Request of the Department of Justice)
that 311 Be Reserved for Community Use)
for Non-Emergency Police Telephone Calls)

CC Docket 92-105

COMMENTS
OF THE
NATIONAL EMERGENCY NUMBER ASSOCIATION

The National Emergency Number Association ("NENA") hereby comments on the Petition for Reconsideration of the International Association of Fire Chiefs and the International Municipal Signal Association ("IAFC/IMSA") filed March 28, 1997 in the captioned proceeding.¹

NENA agrees with IAFC/IMSA that the FCC's decision² pays insufficient attention to alternatives for non-emergency calls and to the risks of confusion with 9-1-1 emergency calling. In fact, the agency insists on making final immediately a national reservation of 3-1-1 for non-emergency access to community police offices (1) despite the pendency of important

¹ Notice of receipt of the IAFC/IMSA and other petitions was published April 8, 1997, 62 *Federal Register* 16808.

² First Report and Order and Further Notice of Proposed Rulemaking, FCC 97-51, released February 19, 1997. ("Order")

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public safety studies³ and industry trials (Order, ¶¶29-31) that could add to the factual record, and (2) in the face of its own request to the North American Numbering Council (Order, ¶61) to study and report back on "alternative abbreviated dialing arrangements" that might provide greater benefits and fewer disadvantages than the chosen 3-1-1 scheme. It would seem the FCC has put the cart before the horse.

The Order's only justification for such haste (¶41) is the professed "need to provide relief, in a timely fashion, when 9-1-1 circuits become congested with non-emergency calls." Yet this explanation occurs in the same paragraph where the FCC acknowledges that local and state authorities, under existing number administration guidelines, could have ordered the same relief even without national reservation.⁴

Because we believe that, with respect to the 3-1-1 reservation, the FCC should study first and then decide, instead of the reverse, we support the request of IAFC/IMSA (Petition, i) to "conduct a reasoned consideration of the wide-ranging issues raised by concerned parties."

Respectfully submitted,

NATIONAL EMERGENCY NUMBER ASSOCIATION
By 

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April 25, 1997 ITS ATTORNEY

³ Letter of APCO President Marilyn Ward to President Clinton, dated August 21, 1996, offering to chair a national ad hoc task force, filed *ex parte* in Docket 92-105 October 7, 1996.

⁴ Clearly, other aspects of the docket were long overdue for resolution. The Order could have treated these without deciding finally on the Justice Department request.

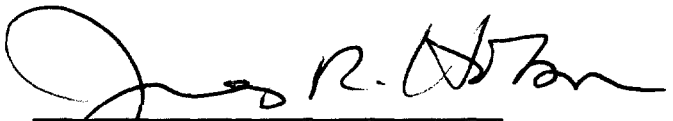
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I certify that copies of the foregoing Comments of the National
Emergency Number Association have been served this date, by mail or hand,
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